

UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND

ROOSEVELT ASSOCIATES, RIGP,.	)	
Plaintiff,	)	Civil Action No.
	)	
v.	)	
	)	
THE SECRETARY OF HOUSING and URBAN	)	
DEVELOPMENT, ERLA PRICE, BLAKE R. PRICE,	)	
KEVIN SULLIVAN	)	
Defendants.	)	

**NOTICE OF REMOVAL**

**TO THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND:**

1. A petition to judicially Foreclose Tax Lien on property located at 346 High St, Cumberland, RI, Assessor's Plat 4, Lot 191 (the "Property") by plaintiff, Roosevelt Associates, RIGP. ("Plaintiff") against the United States, acting on behalf of the Secretary of Housing and Urban Development ("HUD"), has been filed in Providence Superior Court.

2. The document attached as Exhibit A to this Notice is a copy of the Petition; HUD Headquarters received a citation advising them of this action on or about January 25, 2021. It does not appear, based upon the papers and a review of the records of this Office, that service of process has been perfected as to the Attorney General of the United States or the United States Attorney's Office, District of Rhode Island.

3. The facts as alleged in the Petition in the above-action represent a civil action commenced in state court to foreclose all rights of redemption upon property against which the United States of America has or claims ownership or other lien, and in which the United States is named as a Defendant. Such action may be removed pursuant to 28 U.S.C. §§ 1444 and/or 28 U.S.C. § 1442.

4. Since the Summons was received by HUD on or about January 25, 2021, Notice of Removal is timely filed pursuant to 28 U.S.C. § 1446(b).

5. Notice of removal has been provided this date to Plaintiff and the Clerk of the State of Rhode Island, Providence County Superior Court.

6. No defenses, including immunity, are waived by the filing of this Notice of Removal.

Wherefore, notice is respectfully given that the captioned matter is removed to the United States District Court for the District of Rhode Island pursuant to 28 U.S.C. §§ 1442 and 1444. In accordance with 28 U.S.C. § 1446(d), the filing of a copy of this Notice with the Clerk of Court for the Superior Court of the State of Rhode Island and issuance of notice to all adverse parties shall effect the removal, and the state court shall proceed no further with respect to this action unless and until the case is remanded thereto.

Respectfully submitted,

UNITED STATES OF AMERICA

By its Attorneys,

AARON L. WEISMAN  
United States Attorney

s/ Mary Rogers  
MARY ROGERS  
Assistant U.S. Attorney  
United States Attorney's Office  
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CERTIFICATE OF SERVICE

I hereby certify that on the 11<sup>th</sup> day of February, 2021, I caused a copy of the within Notice of Filing of Removal to be forwarded, by postage prepaid mail, to:

Fernando S. Cunha, Esq  
48 East Manning Street  
Providence, RI 02906

/s/ Mary Rogers  
Mary Rogers